

1 BILAL A. ESSAYLI
2 First Assistant United States Attorney
3 ALEXANDER B. SCHWAB
4 Assistant United States Attorney
5 Acting Chief, Criminal Division
6 KYLE W. KAHAN (Cal. Bar No. 298848)
7 JASON A. GORN (Cal. Bar No. 296179)
8 KELLYE NG (Cal. Bar No. 313051)
9 Assistant United States Attorneys
10 1200/1300/1400 United States Courthouse
11 312 North Spring Street
12 Los Angeles, California 90012
13 Telephone: (213) 894-2238/7962/8408
14 Facsimile: (213) 894-0142
15 E-mail: kyle.kahan@usdoj.gov
16 kellye.ng@usdoj.gov
17 jason.gorn@usdoj.gov

18 Attorneys for Plaintiff
19 UNITED STATES OF AMERICA

20 UNITED STATES DISTRICT COURT

21 FOR THE CENTRAL DISTRICT OF CALIFORNIA

22 UNITED STATES OF AMERICA,

23 No. 2:18-CR-00172(A)-GW-1, 6, 7, 8

24 Plaintiff,

25 GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING DOCUMENTS;
DECLARATION OF KYLE W. KAHAN

v.

26 MICHAEL LERMA, et al.,
27 [#1 MICHAEL LERMA]
28 [#6 CARLOS GONZALEZ]
[#7 JUAN SANCHEZ]
[#8 JOSE GONZALEZ]

Defendants.

29 Plaintiff United States of America, by and through its counsel
30 of record, the First Assistant United States Attorney for the Central
31 District of California and Assistant United States Attorneys Kyle W.
32 Kahan, Kellye Ng, and Jason Gorn hereby applies ex parte for an order
33 that the government's legend identifying cooperating witnesses' names
34 submitted concurrently with its omnibus opposition to defendants'
35 Rule 29 and 33 Motions be filed under seal.

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This ex parte application is based upon the attached declaration of AUSA Kyle W. Kahan.

Dated: November 3, 2025

Respectfully submitted,

BILAL A. ESSAYLI
First Assistant United States
Attorney

ALEXANDER B. SCHWAB
Assistant United States Attorney
Acting Chief, Criminal Division

/s/
KYLE W. KAHAN
JASON A. GORN
KELLYE NG
Assistant United States Attorneys

Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF KYLE W. KAHAN

I, Kyle W. Kahan, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am the attorney representing the government in this case.

2. The government requests leave to file its legend identifying cooperating witnesses' names under seal. The document submitted concurrently with the government's omnibus opposition to defendants' Rule 29 and 33 motions contains sensitive cooperating witness information protected under the parties' March 21, 2022, and February 6, 2024 Protective Orders filed at Docket Nos. 787, 1134. Sealing is required to protect those individuals and their families, especially since the government's omnibus opposition goes into detail what each cooperating witness testified to. Disclosure of these documents would tend to endanger the safety of the witnesses and their family members. This is so because individuals who have engaged in criminal activities and prison inmates often retaliate against witnesses and their families.

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3. Should the Court deny this application, the government requests that its legend not be filed, but be returned to the government.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on November 3, 2025.

Kyle W. Kahan
KYLE W. KAHAN